



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10



**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Michael P. Mazza  
President and Registered Agent  
American Petroleum Environmental Services, Inc.  
11535 North Force Avenue  
Portland, Oregon 97217

Re: Requirement to Provide Information (Second Information Request)

Dear Mr. Mazza:

We appreciate the ongoing cooperation of American Petroleum Environmental Services, Inc. (APES) in responding to the Environmental Protection Agency (EPA) and the Oregon Department of Environmental Quality's (ODEQ) Information Request dated April 5, 2015. The purpose of this letter is to require the submission of additional information as we continue investigating the air quality near Hayden Island in North Portland, Oregon.

Under Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, EPA is authorized to require the submission of records, reports, and other information for the purpose of determining whether any violations of the CAA have occurred and for carrying out other purposes of the CAA. Under Oregon Administrative Rule (OAR) 340-212-0120 and OAR 340-214-0110, ODEQ is authorized to require the submission of records, reports, and other information for the purpose of determining the type, quantity, quality, and duration of emissions, issuing a permit, ascertaining applicability of requirements, and ascertaining compliance information. This authority includes, for both EPA and ODEQ, the authority to require the sampling of emissions.

In accordance with this authority, you are hereby served the enclosed Information Request. The Information Request requires APES to provide the requested information and documents regarding the Facility's operations in accordance with and in the time frames specified in Enclosures 1 and 2. Please see Enclosure 1 for instructions and definitions, including instructions regarding the submission of confidential business information. The requested information and documents are set forth in Enclosure 2.

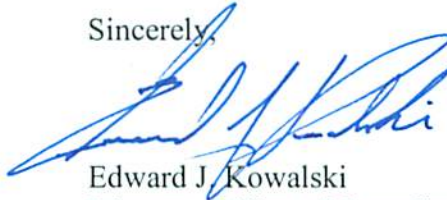
Please sign and return the enclosed Statement of Certification with your responses to this Information Request.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to this Information Request in a timely manner may lead to enforcement action by EPA, ODEQ, or both. Incomplete, ambiguous, or evasive responses may be treated as noncompliance with this Information Request. Additionally, providing false, fictitious, or fraudulent statements or representations may subject you to criminal liability. In addition, even if you fully comply with this Information Request, you may still be subject to administrative, civil, or criminal action by EPA, ODEQ, or both, as provided under their respective applicable laws.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, et seq.

Thank you for your cooperation in this matter. Any technical questions regarding this Information Request should be directed to Katie McClintock (206) 553-2143; for legal matters, contact Julie Vergeront, Office of Regional Counsel, at (206) 553-1497.

Sincerely,



Edward J. Kowalski  
Director, Office of Compliance and Enforcement  
EPA, Region 10

Gerald Ebersole  
Acting Northwest Region Air Quality Manager  
Oregon Department of Environmental Quality

Enclosures

IN THE MATTER OF: )  
 )  
American Petroleum )  
Environmental Services, Inc. )  
 )  
Portland, Oregon, )  
Respondent. )  
\_\_\_\_\_ )

STATEMENT OF CERTIFICATION

I, \_\_\_\_\_, hereby certify that the enclosed response to the above-captioned Information Request is true, accurate, and complete. I certify that the portions of this response which I did not personally prepare were prepared by persons acting on behalf of the Respondent, under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I make this certification both on my own behalf, and on behalf of the Respondent, as its authorized representative.

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

**ENCLOSURE 1 – SECOND INFORMATION REQUEST TO  
AMERICAN PETROLEUM ENVIRONMENTAL SERVICES, INC.**

**A. INSTRUCTIONS**

1. Send a complete response to each question in the Information Request by the time period specified for that question to each of the following addresses:

Katie McClintock, OCE-101  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101

And

Louis Bivins  
Oregon Department of Environmental Quality  
700 NE Multnomah Street, Suite #600  
Portland, Oregon 97232

2. Provide a separate narrative response to each question and subpart of a question set forth in the Information Request.
3. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question; each person who was consulted in the preparation of that response; each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question. In addition, provide a true and correct copy of each such document if not provided in response to another specific request herein.
4. Indicate on each document produced in response to this information request, or in some other reasonable manner, the number of the question to which it corresponds.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.
6. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide a corrected response as soon as possible.
7. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

## **B. DEFINITIONS**

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or its implementing regulations.

1. The “company” refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response must be made in relation to both.
2. “Facility” means the American Petroleum Environmental Services, Inc. facility located at 11535 N. Force Avenue, Portland, OR 97217.
3. “EPA” means the U.S. Environmental Protection Agency.
4. “ODEQ” means the Oregon Department of Environmental Quality.
5. “Document” means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.
6. “First Information Request” means the Information Request dated April 5, 2016 issued by EPA and ODEQ to the company.
7. “Turnaround” means each maintenance event at the Facility that includes shutting down and performing maintenance or repair on the Pfauddler unit, such as replacing wiper blades or cleaning out the unit, and other activities similar to those conducted at the Facility in November of 2015 and April of 2016 which the company has referred to as “turnarounds.”
8. The terms “person” or “entity” has the same definition as “person” as defined in Section 302(e) of the Clean Air Act, and shall include any individual, association, corporation, partnership, or any federal, state, or local governmental entity.
9. The terms “you” or “Respondent” means the addressee of this Request, and the addressee's subsidiaries, divisions, officers, directors, managers, employees, contractors, trustees, partners, successors, assigns, attorneys, and agents, as applicable.
10. The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

### **C. CONFIDENTIAL BUSINESS INFORMATION**

The requested information must be submitted whether or not you regard part or all of it as a trade secret or confidential business information.

#### **For responses submitted to EPA:**

You may, if you desire, assert a business confidentiality claim covering part or all of the information submitted pursuant to Sections 114(c) of the Clean Air Act, 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, Subpart B. All information claimed as confidential should be contained on separate sheet(s) and should be clearly identified as "confidential," "trade secret," or "proprietary." Please note that you bear the burden of substantiating your confidentiality claim.

Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. You should read the above cited statutes and regulations carefully before asserting a business confidentiality claim because certain categories of information, including "emission data" (which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of emissions data), are not entitled to confidential treatment.

#### **For responses submitted to ODEQ:**

You may, if you desire, assert a business confidentiality claim covering part or all of the information submitted pursuant to Oregon Revised Statute (ORS) 192.501(2) and Oregon Administrative Rule (OAR) 340-214-0130. All information claimed as confidential should be clearly marked with the request for exemption from disclosure, including marking as "confidential" or "trade secret" each page of a multi-page document that you believe is confidential, clearly distinguishing between material exempt from disclosure and non-exempt material, and, if possible, placing exempt confidential material on separate pages from non-exempt material.

For a writing to be considered exempt from disclosure as a "trade secret," it must not be patented, it must be known only to a limited number of individuals within the company who have made efforts to maintain the secrecy of the information, the information must derive actual or potential economic value from not being disclosed to other persons, the material must give its users the chance to obtain a business advantage over competitors not having the information, and it must not be emissions data.

Unless you make a claim at the time that you submit the information in the manner described in OAR 340-214-0130, it may be made available to the public by ODEQ without further notice to you. The information covered by such a claim will be disclosed by ODEQ only to the extent and by the procedures set forth ORS 192.410 through ORS 192.505. You should read the above cited statutes and regulations carefully before asserting a business confidentiality claim because certain categories of information, including "emission data" (which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to

the extent related to air quality) of emissions data), are not entitled to confidential treatment.



**ENCLOSURE 2 – SECOND INFORMATION REQUEST TO  
AMERICAN PETROLIUM ENVIRONMENTAL SERVICES, INC.**

*[See First Information Request for Questions 1-11]*

**12. Beginning seven days after receipt of this Information Request until October 1, 2016:**

Sample and analyze the content of all fuel combusted at the Facility and all oil products processed at the Facility before they are shipped off-site; record the specified information; and submit the information as follows:

- a. Before combusting any fuel at the Facility, sample and analyze the content of all fuel for the items in Question 12.e below. The analysis need not be completed prior to combusting the fuel unless otherwise required by statute, regulation, or permit. In addition, a sample of each individual transfer of fuel to a fuel tank (from in-house or a third party) is not required if multiple transfers are stored in the same tank at the Facility and a sample of the tank is taken for analysis before any fuel is combusted from that tank.
- b. Before shipping off-site any oil products processed at the Facility, sample and analyze the content of each such product for the items in Question 12.e below. The analysis need not be completed prior to shipping the product off-site unless otherwise required by statute, regulation, or permit. In addition, the sampling and analysis of oil products to be shipped from the Facility can be conducted on each large tank, even if it contains multiple batches, provided there is written documentation of what batches are included in the tank and before any product is removed from the tank for sale.
- c. For any sample analysis not done on-site, send the sample out for analysis within two days of taking the sample and request sample results from the company performing the analysis within one week of receipt of the sample.
- d. For samples conducted on-site with an X-Ray Fluorescence (XRF) or other similar device, the device must be shown to produce results for each analyte similar to a lab analysis for seven sampling events (or previously have been demonstrated under the First Information Request to EPA and ODEQ's satisfaction to produce results similar to a lab analysis).
- e. Conduct sampling on each tank or batch to determine the following:
  - i. Sulfur content (% sulfur) with ASTM D-4294.
  - ii. Flash point (degrees Fahrenheit (F)) with EPA Method 1010.
  - iii. API gravity at the temperature measured, and API gravity at 60 degrees F.
  - iv. Total halogen content (total halogens in parts per million (ppm)) with EPA Method 9075.
  - v. Polychlorinated biphenyls (PCBs) (PCBs in ppm) with EPA Method 8082.
- f. Record the following information for each sample taken:
  - i. The tank number/designation from which the sample was taken.
  - ii. The date the sample was taken.
  - iii. The name of the person taking the sample.



- iv. The source of the fuel or oil (e.g., third party or in-house tank; if produced in-house, the specific process product cut).
- v. The amount of fuel or oil in the sampled tank (gallons).
- vi. Sulfur content (% sulfur) of the sample with ASTM D-4294.
- vii. Flash point (degrees F) of the sample with EPA Method 1010.
- viii. API at the temperature measured (and the temperature at which measured), and API at 60 degrees F of the sample.
- ix. Total halogen content (total halogens in ppm) of the sample with EPA Method 9075.
- x. PCBs (in ppm) of the sample with EPA Method 8082.
- xi. The analytical method used for each parameter (basing results on Facility knowledge is not adequate).
- g. Submit records required by Question 12.f above on a bi-weekly basis as follows:
  - i. For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for all fuel or product tested during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month) except as provided in Question 12.g.ii below.
  - ii. Submit the required records for samples sent off-site for analysis as part of the bi-weekly submission due immediately following the company's receipt of the sample results.
- h. Submit records of all sampling and analysis for metals content done for or by the company on fuel combusted by the Facility or oil products processed at the Facility. Such records shall be submitted as part of the bi-weekly submission due immediately following the company's receipt of the sample results.

**13. Beginning seven days after receipt of this Information Request until October 1, 2016:**

After a cook is deemed complete but before transferring any oil out of a cook tank into the Pfauddler unit (also referred to as the "back plant"), sample and analyze the content of the oil for sulfur content (% sulfur) with ASTM D-4294; record the specified information; and submit the information as follows:

- a. For any sample analysis not done on-site, send the sample out for analysis within two days of taking the sample and request sample results from the company performing the analysis within one week of receipt of the sample.
- b. For samples conducted on-site with an X-Ray Fluorescence (XRF) or other similar device, the device must be shown to produce results similar to a lab analysis for seven sampling events (or previously have been demonstrated to under the First Information Request to EPA and ODEQ's satisfaction to produce results similar to a lab analysis).
- c. Record the following information for each sample taken:
  - i. The tank number/designation from which the sample was taken.

- ii. The date the sample was taken.
  - iii. The name of the person taking the sample.
  - iv. The amount and concentration of sodium hydroxide that has been added to the tank during processing (gallons).
  - v. The amount of oil in the sampled tank (gallons).
  - vi. Sulfur content (% sulfur) of the sample with ASTM D-4294.
  - vii. The analytical method used (basing results on Facility knowledge is not adequate).
- d. Submit records required by Question 13.c above on a bi-weekly basis as follows:
- i. For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for all product tested during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month) except as provided in Question 13.d.ii below.
  - ii. Submit the required records for samples sent off-site for analysis as part of the bi-weekly submission due immediately following the company's receipt of the sample results.

14. Beginning seven days after receipt of this Information Request until October 1, 2016:

- a. Monitor and record the following information regarding the use of the carbon adsorption unit(s) at the Facility:
  - i. The date, time, and duration of the event during which emissions were sent to a carbon adsorption unit.
  - ii. The identity of the carbon adsorption unit to which the emissions were sent.
  - iii. The origin of the emissions that were sent to the carbon adsorption unit.
  - iv. The reason the emissions were sent to the carbon adsorption unit.
- b. Submit records required by Question 14.a above on a bi-weekly basis as follows:
  - i. For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for each event that occurred during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).

15. Beginning seven days after receipt of this Information Request until October 1, 2016:

- a. Sample concentrations of general mercaptans, methyl mercaptan, isopropyl mercaptan, ethyl mercaptan, hydrocarbons, carbon monoxide, nitrogen oxides, carbonyl sulfide, and carbon disulfide emissions from each emission point/stack at the Facility using the Matheson-Kitagawa Toxic Gas Detection System (or similar sampling tube system) once per week in accordance with the sampling

system manufacturer's instructions and the approved sampling plan being used by the company to comply with Question 5 of the First Information Request.

- b. Submit records of the sampling results from the testing in Question 15.a above on a bi-weekly basis as follows:
  - i. For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the records for the sampling performed during for that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).

**16. Beginning seven days after receipt of this Information Request until October 1, 2016:**

Monitor, record, and submit the specified information for each maintenance or repair activity and each malfunction/upset on a heater/boiler, process vessel, or storage vessel at the Facility as follows:

- a. For each maintenance or repair event (including removing solids from a tank, wiper blade changes, boiler maintenance, or other maintenance or repairs),
  - i. Monitor and record:
    - 1. The designation/identifier of the vessel/process unit that was maintained or repaired.
    - 2. A detailed description of the maintenance or repair performed.
    - 3. The date and time of the event.
    - 4. The duration of the event.
    - 5. A description of any air emissions resulting from the event.
    - 6. A description of any perceived odors during the event.
  - ii. During the event (for events lasting more than three hours) or during or within two hours after the event (for events lasting three hours or less):
    - 1. Conduct a hydrogen sulfide inspection of the Facility in accordance with the approved plan being used by the company to comply with Question 4 of the First Information Request. Create a record of the inspection as provided in Question 4.a.iv of the First Information Request.
    - 2. Conduct an odor inspection of the Facility in accordance with the approved plan being used by the company to comply with Question 6 of the First Information Request. Create a record of the inspection as provided in Question 6.a.ii of the First Information Request.
  - iii. For each Turnaround at the Facility, also monitor and record:
    - 1. The date and time the Pfauddler unit was shut down.
    - 2. A detailed description of each activity involved in the Turnaround, including the purpose of each activity and the sequence in which the activities were conducted.
    - 3. The time, date, and duration of each activity in the Turnaround.

4. The date and time the Pfauddler unit was restarted after the Turnaround.
  5. A detailed description of any time period of irregular operation of the Pfauddler unit related to the Turnaround before steady state operation of the unit is achieved after the Turnaround, including the duration of such period.
  6. The waste streams resulting from the Turnaround (e.g., waste water, solids) and where those streams went (e.g., combustion on-site, evaporation, transfer off-site, wastewater drains, sewage discharge).
- b. For each malfunction/upset event:
- i. Monitor and record:
    1. The designation/identifier of the vessel/process unit at which the malfunction/upset occurred.
    2. A detailed description of the malfunction/upset.
    3. The date and time of the event.
    4. The duration of the event.
    5. A description of any air emissions resulting from the event.
    6. A description of any perceived odors during the event.
    7. The probable cause of the malfunction/upset.
    8. Any corrective actions taken by the company to minimize the duration of or mitigate emissions resulting from the malfunction/upset and to prevent similar malfunctions from occurring.
  - ii. During the event (for events lasting more than three hours) or during or within two hours after the event (for events lasting three hours or less):
    1. Conduct a hydrogen sulfide inspection in accordance with the approved plan being used by the company to comply with Question 4 of the First Information Request. Create a record of the inspection as provided in Question 4.a.iv of the First Information Request.
    2. Conduct an odor inspection in accordance with the approved plan being used by the company to comply with Question 6 of the First Information Request. Create a record of the inspection as provided in Question 6.a.ii of the First Information Request.
- c. Submit records required by Questions 16.a and 16.b above on a bi-weekly basis as follows:
- i. For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for each event that occurred during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month)

17. **By June 13, 2016:** Submit the following information for each maintenance or repair activity and each malfunction/upset on a heater/boiler, process vessel, or storage vessel, at the Facility between August 1, 2015 and seven days after the date of receipt of this Information Request:
- a. For each maintenance or repair event (including removing solids from a tank, wiper blade changes, boiler maintenance, or other maintenance or repairs):
    - i. The designation/identifier of the vessel/process unit that was maintained or repaired.
    - ii. A detailed description of the maintenance or repair performed.
    - iii. The date and time of the event.
    - iv. The duration of the event.
    - v. A description of any air emissions resulting from the event.
    - vi. A description of any perceived odors during the event.
    - vii. For each Turnaround, also submit:
      - 1. The date and time the Pfaudler unit was shut down.
      - 2. A detailed description of each activity involved in the Turnaround, including the purpose of each activity and the sequence in which the activities were conducted.
      - 3. The time, date, and duration of each activity in the Turnaround.
      - 4. The date and time the Pfaudler unit was restarted after the Turnaround.
      - 5. A detailed description of any time period of irregular operation of the Pfaudler unit related to the Turnaround before steady state operation of the unit is achieved after the Turnaround, including the duration of such period.
      - 6. The waste streams resulting from the Turnaround (e.g., waste water, solids) and where those streams went (e.g., combustion on-site, evaporation, transfer off-site, wastewater drains, sewage discharge).
  - b. For each malfunction/upset event:
    - i. The designation/identifier of the vessel/process unit at which the malfunction/upset occurred.
    - ii. A detailed description of the malfunction/upset.
    - iii. The date and time of the event.
    - iv. The duration of the event.
    - v. A description of any air emissions resulting from the event.
    - vi. A description of any perceived odors during the event.
    - vii. The probable cause of the malfunction/upset.
    - viii. Any corrective actions taken by the company to minimize the duration of or mitigate emissions resulting from the malfunction/upset and to prevent similar malfunctions from occurring.

18. By June 13, 2016: For each use of any carbon adsorption unit at the Facility between August 1, 2015 and seven days after the date of receipt of this Information Request, provide:
- The date, time, and duration of the event during which emissions were sent to a carbon adsorption unit.
  - The identity of the carbon adsorption unit to which the emissions were sent.
  - The origin of the emissions that were sent to the carbon adsorption unit.
  - The reason the emissions were sent to the carbon adsorption unit.
19. By June 13, 2016: For each tank in which liquids (e.g., oil, emulsified oil water, wastewater) are processed or treated at the Facility, provide the following information:
- The tank number/designation.
  - The types of liquid(s) processed or treated in the tank since August 1, 2015 (e.g., oil, emulsified oil and water, wastewater).
  - The name of each chemical or other additive added to the tank during that time period and the purpose of adding such chemical or additive.
  - The tank number(s)/designation(s) for the tank(s) that the liquid(s) is transferred to after processing or treatment.
  - The location(s) and tank(s) to which any solids are transferred.
  - A description of where the liquids and solids generated in the tank(s) will eventually go (e.g., combustion on-site, evaporation, transfer off-site, wastewater drains, sewage discharge).
20. Beginning seven days after receipt of this Information Request until October 1, 2016: Record and submit information regarding the operation of the Pfauddler unit as follows:
- Record the information reported hourly from the Human Machine Interface ("HMI") on the Pfauddler unit. The records must, at a minimum, include date, time, feed rate (in gallons per minute), temperature (in degrees F), and pressure (in inches of water).
  - Submit the records required by Question 20.a above in spreadsheet format on a bi-weekly basis as follows:
    - For each bi-weekly period (the first to the 15<sup>th</sup> of the month and the 16<sup>th</sup> to the end of the month) until October 1, 2016, submit the required information for each event that occurred during that bi-weekly period by the 21<sup>st</sup> of the month (for the bi-weekly period covering the first to the 15<sup>th</sup> of the month) and by the sixth of the following month (for the bi-weekly period covering the 16<sup>th</sup> to the end of the month).
21. Beginning seven days after receipt of this Information Request until October 1, 2016: For each Turnaround at the Facility, notify EPA and ODEQ by email as follows:
- Seven days in advance of a planned Turnaround.
  - Within 24 hours of commencing a Turnaround, regardless of whether it is planned or unplanned.

- c. For EPA notification, email Katie McClintock at [mcclintock.katie@epa.gov](mailto:mcclintock.katie@epa.gov).
- d. For ODEQ notification, email Louis Bivins at [bivins.Louis@deq.state.or.us](mailto:bivins.Louis@deq.state.or.us) 503-229-6333.